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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEB 18 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
Amendment of Section 73.202(b))
Table of Allotments) MM Docket No. 96-260
FM Broadcast Stations) RM-8965
(Mankato, Minnesota))

To: Chief, Allocations Branch

COUNTERPROPOSAL FOR LAKE CRYSTAL, MINNESOTA

These Comments are submitted on behalf of Jo Guck Bailey ("Bailey") in connection with the Commission's Notice of Proposed Rulemaking to allocate Channel 231A to Mankato, Minnesota as that community's third FM broadcast service. By these comments, Bailey submits her counterproposal to allocate Channel 231A to Lake Crystal, MN rather than Mankato. Lake Crystal is a growing community in the center of southern Minnesota. However, unlike Mankato, Lake Crystal does not have any broadcasting stations licensed to it. Its size and individual identity indicate that Lake Crystal is deserving of its own radio station..

The 1990 U.S. Census reports a population of 2,084 in Lake Crystal proper. Lake Crystal has a Council-City Clerk form of government. The executive of the Lake Crystal city government is an elected Mayor. The city is managed by a full complement of 39 full and part time city officials including, the City Clerk, a City Administrator, City Office Manager, a Streets Superintendent and City Attorney. A complete array of public services, including a police department, fire department and ambulance and emergency rescue services are provided by the city. A planning committee and a zoning ordinance regulate the construction of all buildings and the use of land within the city. The Lake Crystal City Hall also houses the Lake Crystal Library.

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Lake Crystal is served by the Lake Crystal Wellcome Memorial Area Schools, comprised of two elementary schools, a middle school and the Lake Crystal Wellcome Memorial High School. Together, these schools serve the intellectual, social and emotional needs of more than 1200 students. With 163 employees, these schools have an annual budget of over seven million dollars.

The health needs of Lake Crystal are served by the 64 bed Lake Crystal Healthcare Center and a variety of local medical and dental practices.


The Lake Crystal business community is composed of a myriad of service providers and vendors including over 75 businesses ranging from hardware stores and insurance agents to accountants and farm related businesses. Serving them and Lake Crystal's residents are four local banking institutions.

The religious needs of the community are served by six churches in the city of Lake Crystal and six more in the surrounding area. Lake Crystal is also home to over 15 local service organizations, including the Lions, American Legion, a Masonic Lodge, a chamber of commerce and several youth organizations such as Boy and Girl Scout troops and the 4-H Club. Local celebrations include the Annual Crystal Lake Boat Parade and the annual water ski show and competition. The area is also served by nine local parks and playgrounds providing a rich summer recreational program that need to be publicized and covered by local radio.

Despite all of these governmental, educational, cultural and business interests, Lake Crystal's media needs are served only by one weekly newspaper, the Lake Crystal Tribune. Lake Crystal has a need for a daily resource for information on current civic issues and events, school issues and cultural events. As is shown on the attached channel study, channel 231A can be

properly located to provide full 70 dBu coverage over the city of Lake Crystal with full protection to all adjacent channel stations. Bailey has a present intention to apply for channel 231A if it is allotted and, if authorized, to build a station promptly.

Respectfully submitted,



Gregg R. Skall
Attorney for Jo Guck Bailey

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February 18, 1997

Pepper & Corazzini L.L.P.
Washington D.C.

New Allotment to Lake Crystal MN

REFERENCE

44 06 21 N

94 13 07 W

CLASS = A

Current Spacings

DISPLAY DATES

DATA 01-31-97

SEARCH 02-14-97

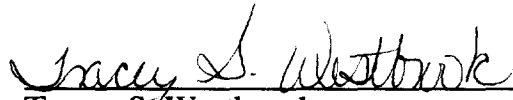
----- Channel 231 - 94.1 MHz -----

Call	Channel	Location		Dist	Azi	FCC	Margin
AD231	AD 231A	Mankato	MN	18.40	67.1	115.0	-96.60
KYRS	LI 231A	Atwater	MN	115.66	338.6	115.0	0.66
KIAI	LI 230C1	Mason City	IA	137.81	138.9	133.0	4.81
KDOMFM	LI 232A	Windom	MN	81.10	252.7	72.0	9.10
WIAL	LI 231C1	Eau Claire	WI	234.80	68.9	200.0	34.80
KNSG	LI 234C2	Springfield	MN	92.90	288.5	55.0	37.90
KSTPFM	LI 233C	St. Paul	MN	136.55	38.4	95.0	41.55
KEGEFM	LI 229C	Minneapolis	MN	136.96	38.9	95.0	41.96
KITN	LI 228C2	Worthington	MN	115.74	236.5	55.0	60.74
KKRC	LI 230A	Granite Falls	MN	139.85	307.2	72.0	67.85
KRFOFM	LI 285A	Owatonna	MN	83.30	92.0	10.0	73.30

CERTIFICATE OF SERVICE

I, Tracey S. Westbrook, a secretary in the law firm of Pepper & Corazzini, L.L.P., do hereby certify that a true copy of the foregoing "Counterproposal for Lake Crystal, Minnesota" was sent this 18th day of February, 1997 by U.S. first class mail, postage prepaid, to the following:

Abdolmjid Khalilzadeh
Philip A. Rubin & Associates, Inc.
1350 Connecticut Avenue, N.W., Suite 610
Washington, D.C. 20036


Tracey S. Westbrook